

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JENNIFER S. FISCHMAN,

Case No.: 18-CV-08188 (JMF)

Plaintiff,

vs.

**DECLARATION OF
JEFFREY CAMHI, ESQ.**

mitsubishi chemical holdings
america, inc., mitsubishi chemical
corporation, mitsubishi chemical
holdings corporation; nicholas
oliva, in his individual and professional
capacities; donna costa, in her individual
and professional capacities; and john does 1-
10, in their individual and professional capacities,

Defendants.

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Jeffrey Camhi, an attorney duly admitted to practice law before the State of New York,
hereby affirms the following to be true under the penalties of perjury:

1. I am an attorney with the law firm of Gordon, Rees, Scully & Mansukhani, LLP,
counsel for Defendants Mitsubishi Chemical Holdings America, Inc., Nicholas Oliva in his
individual and professional capacities, and Donna Costa in her individual and professional
capacities (collectively, "Moving Defendants"). As counsel for Moving Defendants, I am fully
familiar with the facts set forth herein. This Declaration is submitted in support of Moving
Defendants' motion to dismiss pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure.

1. Attached hereto as "Exhibit A" is a Lexis printout of *Johnson, v. MediSys Health
Network*, No. 10-CV-1596 (ERK) (VVP), 2011 U.S. Dist. LEXIS 156828 (E.D.N.Y. April 28,
2011), *report and recommendation adopted*, No. 10-CV-1596, 2011 U.S. Dist. LEXIS, at *5
(E.D.N.Y. June 3, 2011)

2. Attached hereto as "Exhibit B" is a Lexis printout of *Schaefer v. General Elec.,
Co.*, No. 3:07-cv-0858 (PCD), 2008 U.S. Dist. LEXIS 5552 (D. Conn. Jan. 22, 2008).

3. Attached hereto as "Exhibit C" is a Lexis printout of *Peters v. Mount Sinai Hosp.*,
No. 08 Civ. 7250 (CM), 2010 U.S. Dist. LEXIS 32884 (S.D.N.Y. March 30, 2010).

4. Attached hereto as Exhibit “D” is a Lexis printout of *Lewis v. Nationwide Mut. Ins. Co.*, No. 02 Civ. 512 (RNC), 2003 U.S. Dist. LEXIS 5126 (D. Conn. Mar. 18, 2003).

5. Attached hereto as Exhibit “E” is a Lexis printout of *Ifill v. UPS*, No. 04 Civ. 5963 (LTS) (DFE) 2005 U.S. Dist. LEXIS 5230 (S.D.N.Y. Mar. 29, 2005).

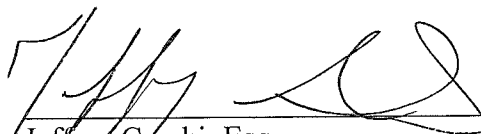
6. Attached hereto as Exhibit “F” is a Lexis printout of *State of New York ex rel. Danon v. Vanguard Group, Inc.*, Index No. 100711/13 (JAM) 2015 N.Y. Misc. LEXIS 4239 (Sup. Ct. New York Cty, 2015).

7. Attached as Exhibit “G” is a Lexis printout of *Kalola v. Int’l Bus. Machines Corp.*, No. 13-CV-7339 (VB), 2015 U.S. Dist. LEXIS 27444 (S.D.N.Y. Feb. 3, 2015).

8. Attached as Exhibit “H” is a Lexis printout of *Ray v. N.Y. State Ins. Fund*, 16 Civ. 2895 (NRB), 2018 U.S. Dist. LEXIS 120728 (S.D.N.Y. July 18, 2018).

9. Attached as Exhibit “I” is a Lexis printout of *McCray v. City of N.Y.*, 03 Civ. 9865 (DAB), 2007 U.S. Dist. LEXIS 90875 (S.D.N.Y. Dec. 11, 2007).

Dated: New York, New York
January 11, 2019


Jeffrey Camhi, Esq.